

EXHIBIT 4

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Attorneys for Defendants, Counterclaimants, and
Third Party Plaintiffs PCJV USA, LLC, PCI
TRADING LLC, POTATO CORNER, LA
GROUP, LLC, GK CAPITAL GROUP, LLC,
NKM CAPITAL GROUP, LLC and GUY
KOREN, and Defendants J & K AMERICANA,
LLC, J&K LAKEWOOD, LLC, J&K
OAKRIDGE, LLC, J&K VALLEY FAIR, LLC, J
& K ONTARIO, LLC, J&K PC TRUCKS, LLC,
HLK MILPITAS, LLC, and GK CERRITOS, LLC

UNITED STATES DISTRICT COURT**CENTRAL DISTRICT OF CALIFORNIA**SHAKEY'S PIZZA ASIA VENTURES,
INC, a Philippines corporation,

Plaintiff,

vs.

PCJV USA, LLC, a Delaware limited
liability company; PCI TRADING, LLC, a
Delaware limited liability company; GUY
KOREN, an individual; POTATO CORNER
LA GROUP, LLC, a California limited
liability company; NKM CAPITAL GROUP,
LLC, a California limited liability company;
J & K AMERICANA, LLC, a California
limited liability company; J&K
LAKEWOOD, LLC, a California limited
liability company; J&K VALLEY FAIR,
LLC, a California limited liability company;
J & K ONTARIO, LLC, a California limited
liability company; HLK MILPITAS, LLC, a
California, limited liability company; GK
CERRITOS, LLC, a California, limited
liability company; J&K PC TRUCKS, LLC,
a California limited liability company; and,
GK CAPITAL GROUP, LLC, a California

Case No. 2:24-CV-04546-SB(AGR_x)*Hon. Stanley Blumenfeld, Jr.***DECLARATION OF ROB T.
MCKAY**

Complaint Filed: May 31, 2024
Trial Date: August 18, 2025

1 limited liability company and DOES 1
through 100, inclusive,

2 Defendants.

3
4 PCJV USA, LLC, a Delaware limited
liability company; PCI TRADING LLC, a
5 Delaware limited liability company;
POTATO CORNER LA GROUP LLC, a
6 California limited liability company; GK
CAPITAL GROUP, LLC, a California
7 limited liability company; NKM CAPITAL
GROUP LLC, a California limited liability
company; and GUY KOREN, an individual,

8 Counter-Claimants,

9 v.

10 SHAKEY'S PIZZA ASIA VENTURES,
11 INC, a Philippines corporation,

12 Counter Defendant.

13
14 PCJV USA, LLC, a Delaware limited
liability company; PCI TRADING LLC, a
Delaware limited liability company;
15 POTATO CORNER LA GROUP LLC, a
California limited liability company; GK
16 CAPITAL GROUP, LLC, a California
limited liability company; NKM CAPITAL
17 GROUP LLC, a California limited liability
company; and GUY KOREN, an individual,

18
19 Third Party Plaintiffs,

20 v.

21 PC INTERNATIONAL PTE LTD., a
Singapore business entity; SPAVI
22 INTERNATIONAL USA, INC., a California
corporation; CINCO CORPORATION, a
23 Philippines corporation; and ROES 1 through
10, inclusive,

24 Third Party Defendants.

DECLARATION OF ROBIN T. MCKAY

I, Robin T. McKay, declare as follows:

1. I am the Director of Administration at Patterson Intellectual Property Law, in Nashville Tennessee. I have personal knowledge of the facts set forth in this declaration, and if called upon to testify under oath, I could and would testify competently thereto.

2. I have worked in the legal industry as a Legal Administrator for over 30 years. From 2000 to 2011 I was the Executive Director of Feldman Gale PA in Miami, Florida. In early 2002 the firm decided to open an office in Los Angeles, and we brought in Todd Malynn to run the office. I first met Todd when he joined the firm in February 2002 when I went to Los Angeles to set up the office.

3. I worked closely with Todd as he had responsibilities for managing the Los Angeles office. We became friends and that friendship continues today. I had occasion to witness Todd's interaction with colleagues and opposing counsel and always found his behavior above reproach. During my time at Feldman Gale, I was responsible for the overall professionalism of the legal employees in the firm and, in my opinion, Todd always presented himself ethically and professionally.

I declare under penalty of perjury under the laws of the United States that the foregoing is true and correct. Executed August 5, 2025, in Nashville, Tennessee.



Robin T. McKay